

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION

IN RE: ERIC MARK WATSON AND	{	CHAPTER 13
OTILIA MARIE WATSON,	{	
	{	
DEBTOR(S)	{	CASE NO. R18-40075-PWB
	{	
	{	JUDGE BONAPFEL

**OBJECTION TO CONFIRMATION**

COMES NOW MARY IDA TOWNSON, TRUSTEE herein, and objects to Confirmation of the plan for the following reasons:

1. The Debtor(s)' payments under the proposed plan are not current.
2. The box in part 1 of the plan is not checked. However, in Section 4.4 the Debtors lists a domestic support obligation.
3. The box checked in Section 4.4 of the plan appears to be inaccurate.
4. Pursuant to the proposed plan, the Debtor has a domestic support obligation. Prior to confirmation the Debtor must provide to the Trustee evidence that all payments that have come due since the filing of the petition have been maintained. 11 U.S.C. Section 1325(a)(8).
5. The Debtor has failed to file tax returns with the tax authorities for the four (4) year period prior to filing in violation of 11 U.S.C. Section 1308.
6. Pursuant to information received from the Meeting of Creditors, 2016 state and federal tax return(s) for Debtor Otilia Watson have not been provided to the taxing authorities; thereby, preventing the Chapter 13 Trustee from evaluating the feasibility of the Chapter 13 plan, in violation of 11 U.S.C. Section 1322(d) and 1325(a)(6).
7. The Debtor(s) have failed to provide adequate notice to Tonya Hill, in violation of 11 U.S.C. Section 342.

Mary Ida Townson, Chapter 13 Trustee  
Suite 2200 - 191 Peachtree Street, N.E.  
Atlanta, GA 30303-1740  
(404) 525-1110  
[albertg@atlch13tt.com](mailto:albertg@atlch13tt.com)

WHEREFORE, the Trustee moves the Court to inquire into the above objections, deny Confirmation of this Debtor's (s') Plan and to dismiss the case; or, in the alternative, convert the case to one under Chapter 7.

\_\_\_\_\_/s/\_\_\_\_\_  
Albert C. Guthrie, Attorney  
for Chapter 13 Trustee  
GA Bar No. 142399

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R18-40075-PWB

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served

DEBTOR(S):

ERIC MARK WATSON  
1403 HWY 411 SOUTH  
CHATSWORTH, GA 30705

OTILIA MARIE WATSON  
1403 HWY. 411 SOUTH  
CHATSWORTH, GA 30705

ATTORNEY FOR DEBTOR(S):

CHRIS RAMPLEY  
P O BOX 927  
ROME, GA 30162-0927

in the foregoing matter with a copy of this pleading by  
depositing in the United States Mail a copy of same in a  
properly addressed envelope with adequate postage thereon.

This 21<sup>st</sup> day of February 2018

\_\_\_\_\_/s/\_\_\_\_\_  
Albert C. Guthrie, Attorney  
for Chapter 13 Trustee  
GA Bar No. 142399

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